

Citizens Advisory Committee on Pipeline Safety

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Dockets Facility

U.S. Department of Transportation

Research and Special Programs Administration

Room PL - 401

400 Seventh Street, Southwest

Washington, D.C. 20590

Subject: Comments on Docket No. RSPA – 01 - 8663

In response to the tragic pipeline explosion in Bellingham, Washington, in June 1999, which took the lives of three young people, the Washington State Legislature enacted legislation and provided funding to strengthen and enhance pipeline safety efforts in Washington. The 2000 legislation also created a Citizens Advisory Committee on Pipeline Safety (“Committee”) and Governor Gary Locke appointed members to the Committee in August 2000. The new law directed the Committee to provide advice and comment to appropriate state and federal agencies and officials on matters related to hazardous liquid and gas pipeline safety, routing, construction, operation and maintenance.

In this context the Advisory Committee wishes to provide the following comments on the Research and Special Programs Administration’s (“RSPA”) proposed rulemaking related to hazardous liquid pipeline accident reporting:

The Committee disagrees with RSPA’s proposal to reduce the threshold for reportable spills from the current level of 50 barrels to 5 gallons. The Committee believes that sufficient information can be acquired from pipeline operators by requiring reporting of incidents that are 1 (one) barrel or larger. The requirement of reporting all spills of 5 gallons or more appears to be more stringent than is required by good practice and necessary record keeping.

The Committee would also like to recommend that the RSPA consider revising its reporting format to coincide with the 22 incident causes discussed by Kiefner and Associates in the report developed by the Hartford Steam Boiler Inspection and Insurance Company. The 22 incident causes developed by Kiefner cover an appropriately wide array of factors that may be used by analysts working on data ultimately collected through the RSPA’s reporting requirements. These factors also improve the level of detailed information that your own office has available for future regulatory action or rulemaking.

Thank you for this opportunity to comment on the proposed rulemaking.

Sincerely,

Chuck Mosher

Chairman, Citizens Advisory Committee on Pipeline Safety